



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

AAS:ICR
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

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By Email, FedEx and ECF

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Re: United States v. Dan Zhong
Criminal Docket No. 16-614 (AMD)

Dear Counsel:

The government is producing the following materials that have been designated "Sensitive Discovery Material" under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37):

- The government is producing English translations of certain Chinese-language source materials previously produced to the defendant on various dates, which have been Bates stamped TR003304-TR003394.

The government is also producing English translations of certain Chinese-language signs depicted in photographs previously produced to the defendant under cover of letter dated June 12, 2017, which have been Bates stamped TR003395-TR003400.

To assist counsel in identifying the Chinese-language source document for each translation, the government has provided to defense counsel under separate cover charts identifying the Chinese-language source document for each translation Bates stamped TR003304-TR003400.

- Pursuant to Rule 16, the government is producing a USB drive that contains forensic reports of digital media voluntarily provided to the government by a witness (DZ068132).
- Pursuant to Rule 16, the government is producing scanned hardcopy documents voluntarily provided to the government by a witness between on or about February 2010 and July 2016 (DZ068133-DZ068363).

- Pursuant to Rule 16, the government is producing photographs of the contents of a laptop bag searched on or about February 11, 2016 (DZ068364-DZ068370).
- Pursuant to Rule 16, the government is producing photographs of envelopes sent to 210 Pavonia Avenue in Jersey City, New Jersey, which were voluntarily provided to the government by a witness (DZ068854-DZ068864).
- Pursuant to Rule 16, the government is producing the result of public records searches performed in or about January and February, 2012, relating to the defendant's associates, company and related entities (DZ068381-DZ068584).
- Pursuant to Rule 16, the government is producing Department of Motor Vehicle Records from the States of New York and New Jersey (DZ068371-DZ068380; DZ068585-DZ068721).
- Pursuant to Rule 16, the government is producing certain New York City Automated Register records for 304 Fifth Avenue, New York, NY (DZ068722-DZ068731).
- Pursuant to Rule 16, the government is producing photographs taken during physical surveillance conducted in the vicinity of 349-351 Summit Avenue and 210 Pavonia Avenue, Jersey City, New Jersey, and the Permanent Mission of the People's Republic of China to the United Nations on or about April 21, 2012 (DZ068732-DZ068773).
- Pursuant to Rule 16, the government is producing photographs taken during physical surveillance conducted in the vicinity of 349-351 Summit Avenue and 210 Pavonia Avenue, Jersey City, New Jersey on or about April 27, 2012 (DZ068774-DZ068817).
- Pursuant to Rule 16, the government is producing a video taken during physical surveillance conducted in the vicinity of 349-351 Summit Avenue, Jersey City, New Jersey, and the Permanent Mission of the People's Republic of China to the United Nations on or about May 2, 2012 (DZ068818).
- Pursuant to Rule 16, the government is producing reports and attachments to reports documenting interviews with employees of the defendant's company at Chicago O'Hare International Airport on or about November 16, 2016 (DZ068819-DZ068840).

- Pursuant to Rule 16, the government is producing photographs of documents carried by an employee of the defendant's company at John F. Kennedy International Airport on or about November 16, 2016 (DZ068841-DZ068844).
- Pursuant to Rule 16, the government is producing notes documenting an interview with an employee of the defendant's company in Brooklyn, New York on or about November 17, 2016 (DZ068845-DZ068846).
- Pursuant to Rule 16, the government is producing photographs taken during physical surveillance conducted in the vicinity of 210 Pavonia Avenue, Jersey City, New Jersey on or about June 21, 2018 (DZ068847-DZ068853).
- Pursuant to Rule 16, the government is producing some financial records obtained from the Bank of China which may have been inadvertently omitted from the government's prior discovery productions (DZ068865-DZ069273).

The government renews its request for reciprocal discovery from the defendant.

Very truly yours,

RICHARD P. DONOGHUE
United States Attorney

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Enclosures (TR003304-TR003400)
(DZ068132-DZ069273)

cc: Clerk of the Court (AMD) (by ECF) (without enclosures)